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9
10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF ARIZONA**

12 In Re Bard IVC Filters Products
13 Liability Litigation

No. MD-15-02641-PHX-DGC

14 **PLAINTIFF'S NOTICE OF LODGING**
15 **PLAINTIFF'S SEPARATE**
16 **STATEMENT OF FACTS**

17 (Assigned to the Honorable David G.
18 Campbell)

(Tinlin Bellwether Case)

19 Pursuant to LRCiv 5.6(d), Plaintiffs submit this Notice of Lodging Plaintiff's
20 Separate Statement of Facts and exhibits thereto.

21 As required under LRCiv 5.6(d), Plaintiffs certify that on March 1, 2019, the
22 parties met and conferred in good faith and were unable to agree about whether the
23 documents are confidential under the Protective Order and should be filed under seal. This
24 dispute notwithstanding, the parties have agreed to continue to meet and confer on the
25 documents at issue.
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27
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1 RESPECTFULLY SUBMITTED this 1st day of March, 2019.

2 BEUS GILBERT, PLLC

3 By: /s/ Mark S. O'Connor

4 Mark S. O'Connor

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CERTIFICATE OF SERVICE

I hereby certify that on this 1st day of March 2019, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing.

/s/Jessica Gallentine